

Rickner PLLC

Stephanie Panousieris | stephanie@ricknerpllc.com


July 19, 2023

Via ECF

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Application **GRANTED**. The fact discovery deadline is extended to **August 21, 2023**, for the limited purpose of completing the depositions referenced herein. An amended case management plan will issue separately. No further extensions will be granted absent extraordinary circumstances.

Dated: July 20, 2023
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *Tiara Jackson v. City of New York, et al.*, 22-CV-508 (LGS)

Your Honor:

This office represents Plaintiff Tiara Jackson in the above-captioned matter and writes to respectfully request a 30-day extension of time to hold a second deposition pursuant to Fed. R. Civ. P. 30(b)(6) to obtain answers to those questions that the City's deponent was not prepared to answer at the July 17, 2023 deposition. Defendants consent to this request.

The Notice of Deposition (*see* Doc. 44-1) included three general categories of topics related to the drafting, development, and implementation of the City's policies and procedures concerning a civilian's right to record police activity. There were several areas of inquiry that were part of the Notice that the deponent was unable to answer on behalf of the City, particularly with respect to the implementation of post-academy training at the command level, and the relationship between arrests for Obstruction of Governmental Administration and Disorderly Conduct where the arrestee was filming at or just before the time of arrest. For this reason, Plaintiff requires additional testimony to satisfy the topics included in the Notice of Deposition.

The City consents to this extension of time and the request for an additional deponent. Plaintiff therefore requests an additional 30-days, from July 21, 2023 to August 21, 2023 to schedule and complete this deposition. This extension will not affect the upcoming settlement conference, scheduled to take place on Friday, July 28, 2023.

We thank the Court for its consideration of this request.

Respectfully,



Stephanie Panousieris